

FORM A SUBMISSION

ALTERNATE THRESHOLD RULE

- **If alternate threshold criteria met:**
 - Form R report is not required
 - No release, other waste management, or source reduction reporting
 - Submit certification statement (Form A)
- **Final rule published in 1994 (§372.27; November 30, 1994; 59 FR 61501)**
- **Does not apply to PBT chemicals**

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■ **Insert Form A (Page 1) here.**

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■ **Insert Form A (Page 1) here.**

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■ Insert Form A (Page 2) here.

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■ Insert Form A (Page 2) here.

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ALTERNATE THRESHOLD RULE

■ Criteria for submitting a Form A

- Do not exceed 1,000,000 pounds manufactured, processed, or otherwise used; and
- Do not exceed 500 pounds for the total annual reportable amount for a Section 313 chemical. Equivalent to the sum of the quantities calculated for Sections 8.1 - 8.7 of the Form R

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POP QUIZ

- You manufacture 100,000 pounds of a non-PBT Section 313 chemical. You sell 99,950 pounds as a product. You emit 25 pounds out a stack, and send 25 pounds off-site for disposal. Do you meet the criteria for submitting a Form A?
- You use 50,000 pounds of nitric acid as a cleaner. The entire amount is neutralized in your on-site wastewater treatment operation and there are no air or water releases. Do you meet the criteria for submitting a Form A?

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ALTERNATE THRESHOLD RULE

■ Recordkeeping

- All documentation to support the determination, including:
 - » Detailed records
 - » Well-labeled calculations and assumptions
- All records used to determine eligibility to file the Form A must be kept for a period of 3 years from the date of the submission of the certification statement (§372.10(d))

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OVERVIEW: FORM R VS. FORM A

■ Form R

- Standard reporting method
- For all Section 313 chemicals
- Report releases, other waste management, and source reduction activities
- Recordkeeping requirements

■ Form A

- Alternate certification statement
- Not allowed for PBT chemicals
- Use for total reportable amounts not exceeding 500 pounds
- Recordkeeping requirements

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